



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

February 28, 2014

BY ECF

Hon. J. Paul Oetken
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States of America ex rel. Keith Edwards v. JPMorgan Chase Bank, N.A., et al.*, No. 13 Civ. 0220 (JPO)

Dear Judge Oetken:

This Office represents the United States of America (the "Government") in the above-referenced *qui tam* action against JPMorgan Chase Bank, N.A., and JPMorgan Chase & Co. (collectively, "Chase"). On February 4, 2014, the Court approved the parties' agreement to settle this action ("Chase Settlement Agreement"). As of that date, the only issues that remained outstanding were the relator's claim against Chase for attorney's fees and costs pursuant to 31 U.S.C. § 3730(d), and the relator's claim against the Government for a share of the settlement amount.

The Government and the relator have now reached agreement on the monetary amount that the relator will be paid to settle his claim for a share of the settlement amount, and are now working to finalize and memorialize the remaining terms of their settlement. Accordingly, the Government and the relator respectfully propose that they be granted until March 7, 2014, to submit a stipulation of settlement and order of dismissal on the issue of relator share. Paragraph 21 of the Chase Settlement Agreement provides that the relator shall submit any application for attorney's fees and costs within two weeks of the date he reaches agreement with the Government on the issue of relator share.

We thank the Court for its consideration of this request.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: /s/Christopher B. Harwood
CHRISTOPHER B. HARWOOD
Assistant United States Attorney
Telephone: (212) 637-2728
Facsimile: (212) 637-2786
Email: christopher.harwood@usdoj.gov

Copy to: BY ELECTRONIC MAIL

David G. Wasinger (dwasinger@wasingerlawgroup.com)
Counsel for the Relator

Alexander H. Southwell (ASouthwell@gibsondunn.com)
Counsel for Defendants

So ordered.
March 5, 2014


J. PAUL OETKEN
United States District Judge